

June 27, 2025

VIA ECF

The Honorable Katherine Polk Failla
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 618
New York, NY 10007

MEMO ENDORSED

Re: *Derlis Chusin Toaquiza v. Joyce, et al.*
1:25-cv-04791

Dear Judge Polk Failla,

New York Legal Assistance Group represents the Petitioner, Derlis Chusin Toaquiza (“Petitioner”), in the above-captioned action.¹ We write on behalf of the parties regarding the Court’s June 20, 2025 Minute Entry ordering the parties to submit a proposed schedule within a week, which includes a deadline by which the anticipated Amended Petition and subsequent briefing shall be due. The parties have agreed that Petitioner’s Amended Petition will be due on Wednesday, July 2, 2025. The parties have also agreed that William P. Joyce, et al. (“Respondents”)’s opposition will be due on Thursday, July 10, 2025, and Petitioner’s reply will be due on Wednesday, July 16, 2025. We accordingly ask that this Court so Order this proposed schedule.

Respectfully Submitted,

/s/ Melissa Lim Chua

Melissa Lim Chua
Lauren M. Reiff
Diana Yanguas Rosen
Rebecca Deanne Rubin

Pro Bono Counsel for Petitioner

¹ Nuala O’Doherty-Naranjo, Tracey Kitzman, and Peter Bryan Katzman will be filing motions to withdraw shortly.

Application GRANTED.

Dated: June 27, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE